

Sandra Gry-Kohan

## **Calculation of Lost Wage Damages**

### **Assumed Facts:**

The Event occurs January 3 of Year #1

The replacement job begins in August of Year #1

### **Variables Used:**

Wages prior to the Event (\$/Yr)	\$57,854
Expected But-For Wage Growth	5%
Work Life Expectancy (Years)	8.0
Duration of Unemployment (Years)	1.0
Replacement Wages	\$57,854
Expected Replacement Wage Growth	2.0%

### **Model Calculation**

	2017	2018	2019	2020	2021	2022	2023	2024	
	<u>Year #1</u>	<u>Year #2</u>	<u>Year #3</u>	<u>Year #4</u>	<u>Year #5</u>	<u>Year #6</u>	<u>Year #7</u>	<u>Year #8</u>	
But-For Wages 5% increase	\$57,854	\$60,747	\$63,784	\$66,973	\$70,322	\$73,838	\$77,530	\$81,406	
Actual Wages	12,003	29,500	31,559	28,263	32,757	45,098	39,528	34,678	
Total Lost Wages Year #1-Year#8	45,851	31,247	32,225	38,710	37,565	28,740	38,002	46,728	
Lost Employer Benefits Year#1 - Year#8	18,887	18,887	18,887	18,887	18,887	18,887	18,887	18,887	see check st
Total wages lost year#1- Year#8	299,068								
benefits wage loss total	151,096	based on check stub from 2016							
Emotional distress	300,000	CAP							
Defamation of Character	1,000,000	NO CAP- estimate-Jury will decide							
Sons outstanding medical bills	6,272								
Student loan interest	60,000.00	accumulated since 2017							
Aflac premiums heart & cancer	16,900	Premiums from 2009-2018				see check stub 2016			
Aflac cancer value lump sum payout	200,000	100,000 per person				see check stub 2016			
aflac heart value lump sum payout	60,000	30,000 per person				see check stub 2016			
Total Wages, Benefits, and Damages	2,093,336								

Employee # 0163706	Voucher # 377870	Federal	State
Dept 1965	Deposit Date 06/05/16	Exemptions 2	2
	Period Ending 06/06/16	Adjustments 0.00	0.00

  

Description	Current	YTD	Description	Current	YTD
REG Regular 80.0	2,275.20	30,117.96			
Closed Campus		582.56	Personal Leave Information		
Fmla - Sick		1,592.64	Sick leave balance: 1.50		
Fmla - Vacation		652.56	Vac leave balance: 136.00		
Holiday		910.08			
Sick Leave		1,677.96			
Vacation		739.44			
<b>Gross</b>	<b>2,275.20</b>	<b>36,403.20</b>			
Taxes/Deductions (Employee paid)					
FICA Withholding	123.07	1,976.01			
Fica Medicare Component	28.78	462.08			
Federal Withholding Single	197.68	3,185.38			
Wis Withholding Single	97.14	1,562.06			
Sec 125b Medical Flex Acct	76.92	1,230.72			
Premium Ded Family Dental/26 P	8.09	129.44			
Allac Pre-Tax Heart	27.17	407.55			
Premium Ded Family/26 Checks	141.58	2,218.09			
Wrs-Employee Portion Pre-Tax	150.16	2,402.56			
Allac Pre-Tax Cancer	37.83	567.45			
Short Term Disability_ee	17.64	282.24			
<b>Deduction Total</b>	<b>906.06</b>	<b>14,423.58</b>			
<b>Net Pay</b>	<b>1,369.14</b>	<b>21,979.62</b>			
Benefits (Employer paid)					
Accidental Death/Dismemberment	0.55	8.80			
Den Fam Employer 12 Mon	99.31	794.48			
Life Ins/Salary >\$50,000.00	4.98	79.68			
LTD for Non Instructional SW	9.62	144.30			
Fam Med Employer	1,738.25	13,638.58			
Wis Retirement Sys (municipal)	150.16	2,402.56			
<b>Benefit Total</b>	<b>2,002.87</b>	<b>17,068.40</b>			
Direct Deposit Information	Amount				
Pioneer Bank	500.00				
Racine Educators C U	569.14				
Personal Leave Information					
Sick leave balance: 1.50					
Vac leave balance: 136.00					

Gateway Technical College	
3520 - 30th Ave	
Kenosha, WI 53144-1680	
Advice Date	Advice No.
06/05/16	377870
<b>PAY THIS AMOUNT</b>	
1,369.14	